

FILED**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE AT NASHVILLE**

2014 FEB 11 AM 11:50

Chris Sevier Plaintiff
V.
John Rich et. al.

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN
CASE NO. 13-cv-01098
Honorable Judge Campbell

**MOTION FOR CLARIFICATION, NOTICE OF FILING OR ALTERNATIVELY
MOTION FOR RECONSIDERATION BASED ON NEW EVIDENCE**

"Do not deny justice to your poor people in their lawsuits." Exodus 23

NOW COMES I, Chris Sevier, pursuant to the local rules and rule 59 requesting clarification. This filing is filed with all sincerity to bring to the Court's attention considerations that were omitted from the last motion for reconsideration. The purpose of this filing is by no means to taunt this Court. The Court needs to have all of the facts before rendering such a decision based on hyper-semantic technicalities that could thwart justice to such a great magnitude. Allow me to first state that it is my position that those who seek to enforce their rights are miserable people. Trying to be right all the time is no way to live. As a Christ follower, Christ made it abundantly clear to, "love you enemies and pray for those who persecute you." Matthew 5:44; He ordered: "If it is possible, as far as it depends on you, live at peace with everyone." Romans 12:18. Blessed are the peacemakers, for they will be called children of God. Matthew 5:9. Christ dying declaration was "forgive them Father, for they do not what they are doing." Luke 23:34. God is the true vindication of wrongs, not man made Courts. Those would pursue negative pursuits reap negativity.

Probably one of the most honorable things one can do is to forgive an offense. I actually preached a sermon once in Haiti on the danger of anger. "Anger is like catching oneself on fire and hoping that the person next to you dies of smoke inhalation." Trying to vindicate ones rights

through the Court system is a terrible idea. Just ask John Rich. Unlike Mr. Rich, I do not even view Mr. Rich as my opponent, but the lies that have made him act the way he does is.

There are times when non-responsiveness in the face of evil is patently immoral. Courts were created to avoid the necessity for self-help measures between parties in dispute to keep the peace. (It was Neville Chamberlain, who declared "peace in our time" just before Hitler invaded Poland.) Sometimes there can be no peace where there is no peace. Sometimes non responsiveness is an act of wickedness by itself. Mr. Rich has a particular tenacious resolve to antagonize me, and I myself must not back down again. "[As] a troubled fountain, and a corrupted spring, [So is] a righteous man that giveth way before the wicked." Proverbs 25:26.

I am not some troubled child who is trying to shake down this wayward celebrity. John Rich provoked this entire controversy by emailing me a series of threats and engaging in a laundry list of illegal measures in an effort to convince my record label and our 26 artists that "Nashville was under his sovereign dominion." For years, I and others turned the other cheek and allowed him to run all over us, which only encouraged his damaging misconduct. I have given Mr. Rich countless opportunities to focus his energies elsewhere, but he has no interest in doing so. There are people in this world, who get pleasure from hurting others. After three years of abuse, I turned to the Courts to seek relief in a straight forward case in hopes of causing John Rich to leave us alone. John Rich could not handle the fact that I actually stood up to him it has flared his ego to cataclysmic levels, which compels him to disregard the law to accomplish his unjust ends. Here is John Rich's inability to let things go demonstrated before the world on Celebrity Apprentice: <http://www.youtube.com/watch?v=oywB5aOUg4c>. Although Mr. Rich suffers from some form of hyper acute insecurity, there is more to the picture than just

entitlement syndrome. Mr. Rich has placed me at the center of his universe because he sincerely believes that he discredit me in order to legitimately run for political office. Fortunately, I have been shot at by Al Qaeda so I am not deterred from being targeted, but this Court cannot allow a rich celebrity to trample on our laws that he hopes to enforce someday.

As much as I would like to simply drop the matters, there is a huge problem. These matters are stalking me. I have been barred from three overseas mission trips since I was arrested for these false charges. Just for example, the day that this Court rejected my first motion for reconsideration (in bad faith) I received this email:

Chris,

I have been notified you are expressing interest in participating in a mission trip to China with Church of the Highlands. I am aware you have pending felony cases in Tennessee so we can not allow you to travel on any Highland's sponsored mission trip, especially one outside the United States. Unless we learn your case has been favorably resolved this action is deemed necessary to protect the purpose of the mission trip and eliminate any potential stumbling block that could affect the mission team while in the field. Thanks for your interest in serving in the mission field ,

John

John A Lucas
Director of Security

Church of the Highlands
One Church ~ Nine Campuses
4700 Highlands Way
Birmingham, AL 35210-4454
205.731-2362

The truth of the matter is that I do not blame Church of the Highlands for being suspicious because traditional Americans trust that the Courts and law enforcement operate, as they were designed to. Here is a rejection letter a few days prior in my request to join a team to Ireland:

I think the Ninja (a nickname for the Plaintiff) is too famous (for not the right reasons) to pull off an incognito trip this time. Carter will be there with us and I do not believe now is the time to come. Instead work on what you need to get done here and we will see what next year brings.

shanebowen

Director of Missional Living
West End Community Church
Nashville, Tennessee
shane@westendcc.org
615-463-8497 ext. 427

There are countless others of these kinds of adverse consequences that have piled up that serve to tie my hands in furthering the greater good. This Court cannot stand for it. A Court of honor, integrity, and scruples should not be to be used to ratify such flagrant evil in a manner that cause it to place its judicial finger in the wound of a combat veteran. I am in the process of developing the first ever Christian EDM record and these matters are interfering with that operation entirely. I cannot allow for self-absorbed individuals to fabric criminal violations because it suits their political or occupational objectives. A major target of my ministerial efforts is directed at the youth. There is an EDM international culture that is exceedingly popular, and yet rife with bad influences and drug addiction. My intent is to provide a source of good influence and alternative focus of celebrating besides merely hedonism. It will be a bit easier to accomplish that with my name a clear from the false accusations of Mr. Rich, Mrs. McKenzie, Justus Dobbson, and Nila Fredericksen. This Court, above all other institutions, should crush their bandwagon momentum in the name justice, not join it. Dispensing such immorality from the bench will not end in favor upon the Court, as history has shown.

Additionally, I file this additional motion for clarification because I can't very well allow this Court to be culpable in the persecution of Christians without its direct knowledge that it is doing so. That would be unfair to the Court. Like I set forth in the Apple case, "intentionality" has material weight, this is why the burden should shift onto the perverted who want to see porn,

not the prudent, who want to avoid it to have to take the extra steps to solidify their mens rea of evil. (Impulsive or accidental interaction with computer pornography must become a thing of the past.) None of that is to suggest that this Court has done anything wrong intentionally. The Court has failed because I have failed to do an adequate job in providing the Court with the necessary information to rule in keeping with justice to avoid absurd and contradictory judicial decisions. Hence this motion.

Additionally, while this consideration is merely an emotional and religious appeal to the Court to correct itself, there is a legal basis behind my additional request. On October 14 2013, at a bond hearing for the false charges, Judge Moreland was not going to impose stringent bond conditions on me. However, John Rich was present at the hearing, along with members of the media, which created a crowd mentality. In an unprecedented fashion, John Rich by passed the Assistant District Attorney and addressed the Court. Acting alone, Mr. Rich presented a ridiculous charade about how he was in fear of his life and begged the Court impose the harshest restrictions on me that were available. (John Rich recently sought an order of protection against me in which he stated that he has hired armed guards to patrol the perimeter of his home; he alleged that I am "heavily armed and dangerous." Meanwhile, all of that is part of the dishonest character that landed him in Federal Court to begin with. (I have never owned a weapon, and I only present a danger to John Rich's pocket book in civil court because I some how I still have faith in the Courts to rule correctly, even if this Court has failed to clue into the unparalleled degree of malicious prosecution and abuse of process that has been taking place thanks to Mr. Rich's and Mrs. McKenzie's belief that they are above the law.

Judge Moreland was effectively led around by the nose ring by John Rich with the

Tennessean watching. It was as if Judge Moreland was playing to the crowd. (Make no mistake many members of the media are greatly opposed to myself because they do not want anyone championing Christianity because it threatens their idols.) Judge Moreland issued a bond restriction that barred me from coming within the zone of the Court house, making filing the fee entirely impossible, in the event that I should have been required to pay out of wounded warrior funds, which is an outrageous contention. Additionally, Judge Moreland ordered that I not file anything in the the John Rich case - which was Mrs. McKenzie's idea of course. In doing so, Judge Moreland completely trampled all over the the Petition Clause of the 1st Amendment. Civil lawyers in the room, who were spectators, were outraged. To his credit, Judge Moreland, later clarified that he meant, that I was not to file anything that would be served onto John Rich or any other witnesses, to include Cyndi McKenzie. But Judge Moreland created confusion as to whether I could show cause to this Court regarding the filing fee, which should have been a nonissue because this Court already had (1) my bank statements that was filed as an exhibit to the complaint; (2) the signed affidavit oath which provided more than enough evidence to allow me to proceed; and (3) the order that it had written in John Rich's malicious prosecution case that awarded him \$24,000 in sanctions, which is the kind of justice dispensed by Roland Freisler. (Which screams of hardcore abuse of discretion and rotten bias).

Even after Judge Moreland issued these unconstitutional bond constitutions, Senior Judge Harris, a Judge of Honor, found Judge Moreland's decision to be ridiculous. I have the right to defend myself against John Rich's pathetic malicious prosecution lawsuit (that this Court ratified when it thought wise to issue sanctions). Judge Harris allowed me to continue to proceed in his Court to ward off John Rich and Cyndi McKenzie's continuing assault through the civil court,

while at all times indication on the record that the case was going to be thrown out.

Yet, the unconstitutional and flagrantly abusive bond conditions imposed by Judge Moreland under the heat of media scrutiny, whose only basis was to dazzle John Rich and the media, cannot be rightfully be used as a sword in this case, unless this Court would like to cause a judicial oversight committed to investigate that matter as well. All of these matters have been meticulously complied and forwarded to the DOD because there is a direct military connection to them all. Make no mistake, the Court is punishing me for failing to pay the filing fees from a pool of funds that go to wounded veterans, which is whether the Court likes it or not - service discrediting conduct. It has always been my intent to keep the Federal Courts away from those affairs, but if this Court is going to victimize me for having served in Iraq by prohibiting me access to the Courts, then I have a duty to report it to DoD IG. There is a zero tolerance policy for discrimination against war veterans, which the Tennessee Supreme Court has openly engaged in such overt discrimination, this Court of honor must not dirty its hands in that corrupt dealing.

On the one hand, this Court was asking me to show cause for my decision to proceed under the pauper oath. On the other hand, Judge Moreland was ordering me not to show cause and telling me that I could not come within the zone of the Federal Court building. I did not know which order to violate? These are the kinds of things that destroy the law economy because of unreliability because Judge Moreland had trampled on the Petition Clause and this Court was engaging in discrimination against a combat veteran. A review of my case in the John Rich affairs conclusively shows that in the Tennessee Courts, the innocent are punished and the guilty are protected? That is the take away from the Rich matter at least. Another take away that is of particular interest to the Nashville Scene is that the Rich can buy justice, but the poor are

doomed. "Do not deny justice to your poor people in their lawsuits." Exodus 23.

On January 9, 2014, there was a hearing before Judge Moreland, new bond conditions were temporarily imposed, which lifted my ability to file a motion to reconsider. In rejecting the motion to reconsider around January 27, 2014, this Court's primary basis for doing so appears to be that I failed to timely provide the Court with evidence to support my pauper oath. But that is a mistaken classification. When I filed this lawsuit, I filed copies of my banking statements that extend back for more than a year. Those 300 pages of statements are consistent with the the information in the affidavit. I have no income. I have no possessions. My only source of funds are federally protected wounded warrior benefits that are by no means designed to pay for the civil Court's filing fees. All I do is volunteer my time to help people who are hurting throughout different parts of the world, as part of a recovery mechanism. Given the evidence of addiction provided by the Apple lawsuit, the 12th step of any 12 step program is for the addict to help others.

Compared to the Apple lawsuit, I hate this one. In fact there is on comparison. In light of the Apple lawsuit this matter is incredibly insignificant. Only myself and the people who I impact directly are materially impacted by the Rich litigation. I prefer to focus on the case that could impact the world. That is more my speed. If I am not provoking actors on the level of the British Prime Minister into action, then I am not very interested. Yet, I do not deserve to be maliciously prosecuted, slandered, abused, and violated because it suits the political interest of megalomaniacs. I expect this Court to dispense justice with neutrality and impartiality. If it cannot it must recuse itself.

I am providing this second motion for reconsideration because off the Court does not

reverse itself it will lead to bizarre judicial consequences. First, pending now before Judge Trauger in the A&E lawsuit is my response to show cause. The basis for that response is nearly identical to the one filed in this case. Because Judge Moreland is not around to pervert Justice in that case I was able to file a timely response. What is going to happen when Judge Trauger grants the motion but this Court refused to? This Court, as does the Honorable Judge Trauger, knows good and well that Federally protected funds distributed to a wounded warrior were not designed to cover the cost of the filing fee as a stumbling block to seeking access. To suggest otherwise would be to ratify service discrediting conduct. The Court should have nothing to do with discrimination against combat veterans, or this decision here too will make its way back up to the TJAG as part of the comprehensive file that has been assembled to make the Tennessee Justice System apply the rule of law. It is not too much for me to ask that the Tennessee Courts do its job and to not get hung up on, who is doing the litigation but what is being litigated.

Additionally, I need clarification. What am I to do now that is not going to paint the Court with the brush of bias? Appeal this Court's decision to the 6th Circuit Court of Appeals? In doing so, I would fill out the pauper oath that attaches with the filing fee. Of course, I will go to the 6th Circuit Court of Appeals and have a 15 minute ex part conversation with those three justices of Honor about my Apple litigation. That the Court can count on.

Additionally, what apprehension am I supposed to take away from this Court given its decision making regarding something as insignificant as the filing fee. What is at stake in my Apple litigation transcends all of us in importance and meaning. I am very concerned about the well being of the children who could be impacted by the outcome of that litigation above all. Incredibly, I am not to the point where I will suggest that the fowl winds of bias have begun to

blow in my nostrils (because I have respect for this Court). But reversal under the totality of the circumstances is consistent with justice. My failure to timely response was not a matter of disrespect it was a matter of spiritual warfare. "For our struggle is not against flesh and blood, but against the rulers, against the authorities, against the powers of this dark world and against the spiritual forces of evil in the heavenly realms." Ephesians 6:12:

Further, I am going to turn around and refile the lawsuit, since a multi-million dollar lawsuit was undoubtedly not dismissed with prejudice due to a \$400 fee. Unsurprisingly, there have been additional violations that have occurred that can be added in that action, which survive the statute of limitations period. When you have people out to hurt you like John Rich, Cyndi McKenzie, and Justus Dobbson, they will never stop until a Court makes them. There false reports continue to come in. Meanwhile, I do not even know this Justus Dobbson and Nila Fredericksen characters, but they have involved themselves in this matter because they were swept up in to the bandwagon that Mr. Rich started and this Court is guilty of furthering.

The very idea that a former Court Officer could be falsely arrested and persecuted to no end should send this Court into a tirade of disbelief. Otherwise, what does it suggest about this Court's view of the integrity of lawyers? There is a large community with the Nashville Bar that are not happy with how the Courts have handled the John Rich matters. Its making the profession look entirely dysfunctional. It breeds distrust in the profession, and causes others to settle disputes through other means, which defeats the purpose of the Courts. Accordingly, I ask that this Court not take my pro se representation as a personal offense, I demand that this Court not engage in service discrediting conduct ever or I'll report it at ever level to higher, and I think that it is in the Court's best interest, not mine, to reverse itself, even if this case is truly annoying,

because it will lead to absurd judicial results otherwise. Above all do not allow this case in any way to take away from the priority action against Apple and Hewlett-Packard, who are in bed with predatory pornographer and who are violating child obscenity laws and products liability tort. (It will likely be a combination of John Griffin, Mark Freeman, and Peter Strianse handling this case, not me). I have an attorney General to contend with.

Respectfully Submitted,

s/Chris Sevier/

9 Music Square South

Nashville, TN 37203

615 500 4411

ghostwarsmusic@gmail.com

soundcloud.com/ghostwars

SIGNATURE PAGE FOR THE FILING

/s/Chris Sevier

9 Music Square South

Nashville, TN 37203

615 500 4411

ghostwarsmusic@gmail.com

soundcloud.com/ghostwars